

# EXHIBIT 3

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

JAMES CONTANT, MARTIN-HAN TRAN,  
CARLOS GONZALEZ, UGNIUS MATKUS,  
JERRY JACOBSON, and PAUL VERMILLION,  
on behalf of themselves and all other similarly  
situated,

Plaintiffs,

vs.

BANK OF AMERICA CORPORATION, et al.,

Defendants.

**ECF CASE**

No. 1:17-CV-03139 (LGS)

**DECLARATION OF MARK CHAMBERS**

I, Mark Chambers, declare and state as follows under penalty of perjury:

1. I am Deputy Group Company Secretary for HSBC Holdings plc.
2. In my capacity as Deputy Group Company Secretary for HSBC Holdings plc, I have personal knowledge of the matters set forth herein and believe them to be true and correct based on: (a) my work for HSBC Holdings plc, and (b) my review, or someone else's review at my direction, of relevant business records.
3. HSBC Holdings plc is a public limited company, incorporated under the laws of England and Wales, with its registered office and principal place of business in London, England.
4. HSBC Holdings plc is not incorporated in New York or in any other state in the United States.

5. During the putative class period (December 1, 2007 to December 31, 2013), HSBC Holdings plc did not have any offices, branches, or other regular place of business in New York or in any other state in the United States.

6. HSBC Holdings plc is a holding company, not a bank. It does not have any foreign exchange trading operations.

7. HSBC Holdings plc maintains separate books and records and a separate corporate existence from its subsidiaries and affiliates.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and belief.

Executed in LONDON, UK on June 8, 2017.



---

**MARK CHAMBERS**  
Deputy Group Company Secretary  
*HSBC Holdings plc*